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11	Attorneys for Defendant		
12	SUSTAINABLE MODULAR MANAGEMENT, INC.		
13			
	UNITED STATES I	DISTRICT COURT	
14	DISTRICT O	F NEVADA	
15			
16	UNITED STATES OF AMERICA, for the use and benefit of BOMBARD ELECTRIC, LLC,	Case No.: 2:20-cv-01200-APG-VCF	
17	Plaintiff,		
18	vs.	STIPULATION TO EXTEND SUSTAINABLE MODULAR	
19		MANAGEMENT, INC.'S	
	JE DUNN CONSTRUCTION COMPANY, a Missouri corporation;	TIME TO RESPOND TO THE SHERWIN-WILLIAMS	
20	SUSTAINABLE MODULAR	COMPANY'S COMPLAINT IN INTERVENTION	
21	MANAGEMENT, INC., a Texas corporation;		
22	HARTFORD FIRE INSURANCE COMPANY, a surety; TRAVELERS CASUALTY AND	(FOURTH REQUEST) <sup>1</sup>	
	SURETY COMPANY OF AMERICA, a		
23	surety; FEDERAL INSURANCE COMPANY, a surety; PACIFIC INDEMNITY COMPANY,		
24	a surety; DOES 1 through 10; and ROE		
25	ENTITIES 11 through 20, inclusive,		
26	Defendants.		
-			
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 $<sup>^{\</sup>scriptscriptstyle 1}$  This the Fourth Requst to extend response deadlines, but it is the first request as to Sustainable Modular Management, Inc.'s response to The Sherwin-Williams Company's Complaint in Intervention.

This Stipulation to Extend Sustainable Modular Management, Inc.'s Time to Respond to the The Sherwin-Williams Company's Complaint in Intervention (the "Complaint in Intervention") is made by and between Intervenor The Sherwin-Williams Company ("Sherwin-Williams") and Defendant Sustainable Modular Management, Inc. ("Defendant") through its respective counsel, in light of the following facts:

## **RECITALS**

- A. Sherwin-Williams filed the Complaint in Intervention on or about August 7, 2020.
- B. The current deadline for Defendant to respond to the Complaint in Intervention is September 3, 2020.
  - C. All defendants have been served.
- D. Multiple claims related to the same subject matter have been filed in both federal and Nevada courts. This stipulation seeks to align Defendant's response deadline for the Complaint in Intervention with response deadlines in a related case. Moreover, the additional time will allow Defendant time to gather the facts necessary to analyze and respond to Sherwin-Williams' claims, and to coordinate with counsel in the related cases regarding an efficient and coherent litigation approach.
- E. The parties have agreed that SMM shall have until September 24, 2020, to respond to the Complaint in Intervention.
- F. There is good cause to grant this stipulation because the extension seeks to conserve judicial resources by developing a coherent approach to multiple related cases.
- G. This stipulation is filed in good faith and not intended to cause delay.

1	H. Pursuant to Local Rule L	A 6-2, Sherwin-Williams and SMM
2	respectfully request that the Court extend the	he time for Defendant to respond to the
3	Complaint in Intervention through September 24, 2020.	
4	<b>STIPULATION</b>	
5	NOW, THEREFORE, Sherwin-Williams and SMM hereby stipulate and	
6	agree that SMM shall have up to and including September 24, 2020, to file a	
7	response to the Complaint in Intervention.	
8	IT IS SO STIPULATED.	
9	DATED this 4th day of September, 2020.	DATED this 4 <sup>th</sup> day of September, 2020.
10	HUTCHISON & STEFFEN, PLLC	MORRIS LAW GROUP
11	By:/s/JOSEPH R. GANLEY	By: <u>/s/ ROSA SOLIS-RAINEY</u> Steve Morris, Bar No. 1543
12	Joseph R. Ganley (5643) Patricia Lee (8287) Peccole Professional Park 10080 West Alta Drive, Suite 200	Rosa Solis-Rainey, Bar No. 7921 411 E. Bonneville Ave., Ste. 360
13		Las Vegas, Nevada 89101
14	Las Vegas, NV 89145 Tel: (702) 385-2500	HALLETT & PERRIN, P.C. Michael S. Alfred (will comply with LR-
15	Fax: (702) 385-2086 jganley@hutchlegal.com	IA-11.2 within 45 days) 1445 Ross Ave, Suite 2400
16	plee@hutchlegal.com	Dallas, Texas 75202 Email: malfred@hallettperrin.com
17	Attorneys for The Sherwin-Williams	Attorneys for Defendant
18	Company	Sustainable Modular Management, Inc.
19		
20	ORDER  IT IS SO ORDERED  United States Magistrate Judge	
21		
22		
23		
24	DA	9-10-2020 ATED
25		
26		
27		
28		

1	<u>CERTIFICATE OF SERVICE</u>		
2	Fed. R. Civ. P. 5(b) and Section IV of District of Nevada Electronic Filing Procedures		
3	I certify that I am an employee of MORRIS LAW GROUP, and that the following document		
4	was served via electronic service STIPULATION TO EXTEND SUSTAINABLE		
5	MODULAR MANAGEMENT, INC.'S TIME TO RESPOND TO THE SHERWIN-		
6	WILLIAMS COMPANY'S COMPLAINT IN INTERVENTION.		
7			
8	TO:		
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19	Tel: (702) 385-2500	Attorneys for Defendants,	
1)	Fax: (702) 385-2086	JE Dunn Construction Company,	
20	jganley@hutchlegal.com	Harford Fire Insurance Company,	
21	plee@hutchlegal.com	Federal Insurance Company and	
22	Attorneys for The Sherwin-Williams	Travelers Casualty and Surety Company of America	
23	Company	Timerica	
24	Dated this 4 <sup>th</sup> day of September, 2020.		
25	Dated this 4" day of September, 2020.		
		(	
26	By: /s/ PATRICIA QUINN		
27	All	Employee of Morris Law Group	
28			